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21 *and Mitsubishi Electric Visual Solutions America, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

**Case No. 3:07-cv-5944-SC
MDL No. 1917**

This Document Relates to:

**DECLARATION OF SHAUN M. VAN HORN
IN SUPPORT OF MITSUBISHI ELECTRIC
DEFENDANTS' ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER SEAL**

Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;

Electrograph Systems, Inc., et al. v.
Technicolor SA, et al., No. 13-cv-05724;

Interbond Corp. of Am. v. Technicolor SA,
et al., No. 13-cv-05727;

Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;

P.C. Richard & Son Long Island
Corporation, et al. v. Technicolor SA, et al.,
No. 13-cv-05725;

Target Corp. v. Technicolor SA, et al.,
No. 13-cv-05686;

*Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;*

*Schultze Agency Services, LLC v.
Technicolor SA, Ltd., et al.*, No. 13-cv-
05668;

*Sears, Roebuck and Co., et al. v.
Technicolor SA*, No. 13-cv-05262:

Dell Inc., et al. v. Phillips Electronics North America Corporation, et al., No. 13-cv-02171;

Tech Data Corp., et al. v. Hitachi, Ltd., et al., No.13-cv-00157:

Siegel v. Technicolor SA, et al., No.13-cv-05261:

Viewsonic Corporation v. Chunghwa Picture Tubes Ltd., et al., No.13-cv-02510.

DECLARATION OF SHAUN M. VAN HORN

I, Shaun M. Van Horn, declare as follows:

1. I am an attorney licensed to practice law in the State of Illinois, and I am an associate at the law firm of Jenner & Block LLP, and attorney of record for Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc. (collectively, the “Mitsubishi Electric Defendants”). I submit this declaration in support of the Mitsubishi Electric Defendants’ Administrative Motion to File Documents Under Seal (the “Motion”). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to such facts under oath.

1 2. On June 18, 2008, this Court signed the stipulated Protective Order (Case No.
2 3:07-cv-05944-SC, Dkt. No. 306), that allows a party to designate a document or deposition
3 testimony “Confidential” or “Highly Confidential” when that party believes the document or
4 testimony contains “trade secrets, or other confidential research, development, or commercial
5 information, within the meaning of Fed. R. Civ. P. 26(c); or other private or competitively
6 sensitive information for which special protection from public disclosure and from use for any
7 purpose other than prosecuting this litigation would be warranted.” *See id.* at 1-6.

9 3. When litigation materials are designated confidential pursuant to the Protective
10 Order, “a Party may not file [them] in the public record.” “A party that seeks to file under seal
11 any Protected Material must comply with Civil Local Rule 79-5.” *Id.* at 11.

12 4. Pursuant to Civil Local Rules 7-11 and 79-5, and the Stipulated Protective Order,
13 the following should be maintained under seal: Exhibits 24 and 26-29 to the Declaration of
14 Gabriel A. Fuentes in Support of Mitsubishi Electric Corporation’s Reply in Support of Its
15 Motion for Summary Judgment Based on Absence of Evidence of Liability and the redacted
16 portions of the Reply are “Confidential” or “Highly Confidential” expert reports, deposition
17 testimony, and other private or competitively sensitive information, designated as “Confidential”
18 or “Highly Confidential” by the Mitsubishi Electric Defendants and other Defendants pursuant to
19 the Protective Order.

21 I declare under penalty of perjury under the laws of the State of California and the United
22 States that the foregoing is true and correct.

24 Executed this 23rd day of January, 2015 at Chicago, Illinois.

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2 Dated: January 23, 2015

JENNER & BLOCK LLP

3 By: /s/ Shaun M. Van Horn
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